



February 24, 2012  
Via ECFS

Ms. Marlene H. Dortch, FCC Secretary  
Office of the Secretary  
Federal Communications Commission  
445 12<sup>th</sup> Street, SW, Suite TW-A325  
Washington, DC 20554

**RE: EB Docket No. 06-36**  
**2011 CPNI Certification Filing for Custom Teleconnect, Inc.**  
**Form 499 Filer ID 815080**

Dear Ms. Dortch:

In accordance with Federal Communications Commission's Enforcement Advisory No. 2012-01, DA 12-170, EB Docket No. 06-36, released February 16, 2011 and pursuant to 47 C.F.R. § 64.2001 *et seq.*, Custom Teleconnect, Inc. files its Certification of Customer Proprietary Network information (CPNI) for the year 2011. Please include this Certification in EB Docket No. 06-36.

Any questions you may have concerning this filing may be directed to me at 470-740-8575 or via email to [cwrightman@tminc.com](mailto:cwrightman@tminc.com).

Sincerely,

/s/ Connie Wightman

Connie Wightman  
Consultant

CW/lw

Attachments

cc: Vicki Crowder – Custom Teleconnect  
file: Custom Teleconnect– FCC CPNI  
tms: FCCx1201 CPNI

ANNUAL 47 C.F.R. § 64.2009(e) OFFICER'S CERTIFICATION OF  
CUSTOMER PROPRIETARY NETWORK INFORMATION (CPNI) COMPLIANCE

EB DOCKET 06-36

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Annual 64.2009(e) CPNI Certification for: 2012      Calendar Year: 2011

Name of Company covered by this certification:      Custom Teleconnect, Inc.


Form 499 Filer ID:      815080

Name of Signatory:      Vicki Crowder

Title of Signatory:      President

I, Vicki Crowder, certify and state that:

1. I am the President of Custom Teleconnect, Inc., and, acting as an agent of the Company, I have personal knowledge that the Company has established operating procedures that are adequate to ensure compliance with the Commission's CPNI rules *See* 47 C.F.R. §64.2001 *et seq.*
2. Attached to this certification as Exhibit A is an accompanying statement explaining how Custom Teleconnect, Inc.'s procedures ensure that the Company is in compliance with the requirements (including those mandating the adoption of CPNI procedures, training, recordkeeping, and supervisory review) set forth in § 64.2001 *et seq.* of the Commission's rules.
3. The Company has not taken any actions (i.e., proceedings instituted or petitions filed by a company at either state commissions, the court system, or at the Commission against data brokers) against data brokers in the past year.
4. The Company has not received any Customer complaints in the past year concerning the unauthorized release of CPNI.
5. The Company represents and warrants that the above certification is consistent with 47 C.F.R. §1.17 which requires truthful and accurate statements to the Commission. The Company also acknowledges that false statements and misrepresentations to the Commission are punishable under Title 18 of the U.S. Code and may subject it to enforcement action.

  
\_\_\_\_\_  
Vicki Crowder, President  
Custom Teleconnect, Inc.

2/23/12  
\_\_\_\_\_  
Date

Exhibit A

Statement of CPNI Procedures and Compliance

**Custom Teleconnect, Inc.**

Calendar Year 2011

ANNUAL 47 C.F.R. § 64.2009(e) OFFICER'S CERTIFICATION OF  
CUSTOMER PROPRIETARY NETWORK INFORMATION (CPNI) COMPLIANCE

EB DOCKET 06-36

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Custom Teleconnect, Inc.

Statement of CPNI Procedures and Compliance

Custom Teleconnect, Inc. ("Company" or "CTI") operates solely as a provider of operator services to pay telephones and hospitality locations and as a provider of inmate operator services to confinement facilities. As such CTI provides only operator assisted call completion services to transient users. Therefore, all of its services consist of casual traffic provided outside of any subscribed service relationship. Moreover, CTI does not market its services to end users in any fashion. Its marketing efforts are directed towards aggregators and such efforts do not include the use of CPNI.

Should CTI expand its business in the future to include the provision and/or marketing of services that involve CPNI, it will follow the applicable rules set forth in 47 CFR Subpart U, including, if necessary, the institution of operational procedures to ensure that notification is provided and customer approval is obtained before CPNI is used or disclosed, that it implements authentication procedures that do not require the use of readily available biographical or account information, that it notifies customers of account changes.

The Company does not bill Customers directly. Instead, the Company provides rated call records to billing companies and billed calls appear on the Customer's local exchange company bill or credit card bill. To the extent that the billing companies act as agents for the Company and provide call detail information to Customers over the telephone, Custom Teleconnect has contacted its billing company and received written assurance of the billing company's compliance with 47 CFR Subpart U.

In lieu of contacting the Company's billing companies, Customers may contact CTI directly to review or discuss the CTI portion of the LEC bill. If a Customer is not able to provide the call detail information to qualify for the FCC exemption, the Company requires the Customer to either call back with the information, or fax a copy of the bill pages directly to CTI and CTI will call the Customer back the telephone number of record.

Procedures have been in place since the Company's inception in 1993 to protect the privacy of call detail from improper use or disclosure by employees and to discover and protect against attempts by third parties to gain unauthorized access to such information. When a Customer asks for disclosure of CPNI, the Company asks the request to be put in writing by the customer of record. The response will be made in writing to the address of record. In addition, employees are instructed to refer inquiries that appear to be suspicious to their supervisor or the General Manager.

Custom Teleconnect, Inc.

Statement of CPNI Procedures and Compliance  
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The CPNI protection procedures are addressed in the Company employee manual. The Company reviews CPNI procedures annually with all employees and has instituted a corresponding disciplinary process to ensure that its employees understand and comply with restrictions regarding the use and disclosure of, and access to CPNI and call detail records. Employees who fail to adhere to the Company's policies are subject to escalating disciplinary measures ranging from oral and written reprimands, to possible termination of employment. Such measures have not been necessary to date.

The Company does not provide Customers with web access to Customer records. If it elects to do so in the future, it will follow the applicable rules set forth in 47 CFR Subpart U, including the implementation of authentication procedures that do not require the use of readily available biographical or account information and customer notification of changes.

The Company has in place procedures to maintain records of all breaches of call detail records and CPNI discovered, and to notify law enforcement, the United States Secret Service and the FBI in the event of a breach of Customers' CPNI and/or call detail records, and to ensure that Customers are notified of the breach before the time period set forth in the FCC's rules, or, if applicable, when so authorized by law enforcement. A breach would be handled directly by the General Manager or President of the Company.

The Company does not have any retail locations and, therefore, does not disclose CPNI at in-store locations.

Law enforcement requests for call detail records are only granted if submitted by verified law enforcement agencies.

The Company has not taken any actions against data brokers in the last year.

The Company did not receive any Customer complaints about the unauthorized release of CPNI or call records in calendar year 2011.

The Company has not developed any information with respect to the processes pretexters are using to attempt to access CPNI or call records.